

UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

ROBERT HANSBURY and BARBARA ANN  
HANSBURY, h/w

Plaintiffs,

v.

SUREHAUL TRANSPORT, INC., WILLIAM  
MALDONADO and CHARLES SOLOMON, JR.

Defendants.

CIVIL ACTION NO. 02CV3219

**REQUIRED DISCLOSURES UNDER FEDERAL  
RULE OF CIVIL PROCEDURE 26**

**A. Disclosures Pursuant to Rule 26(a)(1)(A)**

1. William Maldonado

(Party to this action)

2. Charles Solomon

(Party to this action).

3. Steve Sorbello

Surehaul Transport, Inc.

4. Jim Franklin, Mr. Zombone, Jim Driscoll, Chris O'Hearn, Jim Doherty, Jim Franklin, Mike Sloan

Weber Display and Packaging, 3500 Richmond Avenue, Philadelphia, PA.

5. Jim Rich, J.R. Mitch

Mark Adjustment Service, P.O. Box 903, Seven Cedar Street, Ramsey, NJ 07446.

Investigator retained by Providence Washington Insurance Company.

**B. Documents**

Correspondence between Providence Washington and Mark Adjustment Services. Mark Adjustment was specifically retained to investigate plaintiff's alleged accident of July 27, 2000. Mark Adjustment was retained in anticipation of litigation. None of the correspondence between Providence Washington and Mark Adjustment has been produced in that it is prepared in anticipation of litigation. The documents that have not been produced include the following:

1. July 28, 2000 and February 2, 2001 letters of Providence Washington to Mark Adjustment.
2. Reports of Mark Adjustment dated July 28, 2000, September 7, 2000, October 6, 2000, March 1, 2001, May 21, 2001, July 5, 2001, November 9, 2001, May 8, 2002.

The following have been produced and attached hereto:

3. Two page automobile Accord Loss Notice. Not attached. Privileged communication in anticipation of litigation.
4. Providence Washington Insurance Company referral to counsel form. One page. Privileged communication prepared in anticipation of litigation and including privileged communications to counsel.
5. Claims log of Providence Washington relating to assignment of suit and investigation of claim. Not attached. Privileged communication prepared in anticipation of litigation.
6. Bodily injury information summary and serious loss report prepared by Providence Washington claims representatives in anticipation of litigation. Not attached. Privileged communication.

The following documents have been produced and are attached hereto:

7. Correspondence of James F. Rich of Mark Adjustment Services to plaintiff's counsel dated June 26, 2001.

8. Correspondence of Jacqueline Keys of First Union to Providence Washington dated June 6, 2002 with accompanying Complaint attached hereto.

9. Correspondence of Neil Greenberg to Mark Adjustment dated September 27, 2000 attached hereto.

10. Correspondence of plaintiff's counsel dated March 19, 2001, May 29, 2001 and May 16, 2001 attached hereto.

11. Correspondence of Liberty Mutual Insurance Company to Providence Washington dated October 30, 2001 and January 30, 2001.

12. Correspondence of Weber Display and Packaging dated August 30, 2001 to Providence Washington attached hereto.

13. Invoice of Eastern Lift Truck Company, Inc., Number WX72736 dated September 14, 2000 attached hereto.

14. Work Order W72736 dated August 1, 2000 (two pages) attached hereto.

15. Fax transmittal sheet from Eastern Lift Truck Company, Inc. dated August 4, 2000 attached hereto.

16. Seventeen photographs of the accident scene taken on August 1, 2000 by Jim Rich, attached.

17. Correspondence of Providence Washington to plaintiff's attorneys dated October 12, 2000 and June 5, 2001, attached.

18. Three page policy master sheet for policy T1A2100707 attached.

**C. None**

**D. Copy of the policy will be provided shortly.**

Dated:

**POST & SCHELL, P.C.**

By: \_\_\_\_\_  
Joseph R. Fowler  
Attorneys For Defendants

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